EPA Registration No. 70506-246 Part 2

Material Sent for Data Extraction

Reg. #70506-246
Description: 1618/1 (mr. Norman)
☐ Material(s) Sent to Data Extraction Contractors:
☐ New Stamped Label Dated
□ Notification Dated <u>****</u>
☐ New CSF(s) Dated
Other:
Decision #: $\frac{489209}{91124}$
Other Action/Comments:
File this coversheet and attached materials in the jacket. It must be well organized and clipped together, NOT STAPLED. Then give the jacket with the coversheet and materials to staff in the Information Services Center (ISC) (Room S-4900). If a jacket is full or only available as an image, please file materials in a new jacket and bring it down to the (ISC). For further information please call 703-605-0716.
Reviewer: <u>Maggie Rudick</u>
Phone: $703-347-0257$ Division: RD/HB/Team 25 Date: $7167-7$



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

August 8, 2014

Rebecca Clemmer United Phosphorus, Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406

Subject: Notification per PR Notice 98-10 - Revised Basic CSF

UPI Technical Pendimethalin EPA Reg. No. 70506-246

Application Dated: May 6, 2014

Dear Ms. Clemmer:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the subject product.

The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of this notice. The revised basic CSF, dated June 12, 2014 has been date stamped "Notification" and will be placed in our records, replacing all previously submitted versions.

If you have any questions regarding this letter, please feel free to contact Maggie Rudick at (703) 347-0257 or <u>rudick.maggie@epa.gov</u>.

Sincerely,

Kable Bo Davis

Product Manager 25

Trest of Red ...

Herbicide Branch

Registration Division (7505P)

,",



United Phosphorus, Inc.

630 Freedom Business Center Suite 402 King of Prussia, PA 19406 (610) 491-2828 (phone) (610) 491-2810 (fax)

Rebecca A. Clemmer Regulatory Manager

May 6, 2014

Kable Bo Davis (PM25)
Document Processing Desk (NOTIF)
Office of Pesticide Programs (H7504P)
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Ave., N.W.
Washington, D.C., 20460

Re: UPI Technical Pendimethalin (EPA Reg. No. 70506-246)

Correction of Address on CSF

Dear Mr. Davis.:

United Phosphorus, Inc. has become aware that the postal code on the approved Confidential Statement of Formula for the subject product is incorrect.

Enclosed please find a marked copy of the basic formula dated 10/14/11 with the correct information. Also enclosed is EPA Form 8570-1.

Please contact me if you have any questions.

Zeloura a Ca Chemon

Very truly yours,

Rebecca A. Clemmer

rebecca.clemmer@uniphos.com

Rudick, Maggie

radick, waggie	
From: Sent: To: Subject: Attachments:	Rebecca Clemmer <rebecca.clemmer@uniphos.com> Thursday, July 17, 2014 2:43 PM Rudick, Maggie Re: 70506-246 - CSF Notification 70506-246 UPI Technical Pendimethalin CSF basic 6-12-14.pdf</rebecca.clemmer@uniphos.com>
Dear Maggie,	
Please see the attached.	
Rebecca	
Rebecca A. Clemmer Regulatory Manager United Phosphorus, Inc. 610-491-2828	
×	
On Thu, Jul 17, 2014 at 1	11:27 AM, Rudick, Maggie < Rudick.Maggie@epa.gov > wrote:
Rebecca –	
Can you please follow t	up on the requested CSF?
Thank you,	

Maggie Rudick
U. S. Environmental Protection Agency
Office of Pesticides Program
Registration Division; Herbicide Branch
(703) 347-0257
Rudick.Maggie@epa.gov

From: Rudick, Maggie

Sent: Thursday, June 12, 2014 12:57 PM To: 'rebecca.clemmer@uniphos.com' Subject: 70506-246 - CSF Notification

Rebecca -

I looked over your CSF notification dated 5/6/14 yesterday. Since revisions were made to the CSF, please send in a revised version with the current submission date, not the date of the original submission (10/14/11). You can use today's date or whatever date you send in the new CSF.

Thank you,

Maggie Rudick
U. S. Environmental Protection Agency
Office of Pesticides Program
Registration Division; Herbicide Branch
(703) 347-0257
Rudick.Maggie@epa.gov

Please read instructions on revers	e before completing form		F	orm /			0060, Approval ex	
	Unite	ed States			Registrati	on	OPP Ident	ifier Number
\$EPA	Environmental Protection Agency			X	Amendme	ent		
	Washing	ton, DC 20460			Other			
	Арр	lication for	Pesticide - Secti	on	I			
Company/Product Number Company/Product Number Company/Product Number Company/Product Number Company/Product Number			2. EPA Product N	Mana	ager	3. Prop	oosed Classific	ation
70506-246 4. Company/Product (Name)			Davis PM #			┨ <u>┌</u>	None F	Restricted
United Phosphorus, Inc/UPI To			25					
5. Name and Address of Appl	icant (Include ZIP Code)		6. Expedited Re					
United Phosphorus, Inc. 630 Freedom Business Center	r Suite 402		(b)(i), my product	IS SI	milar or identic	cai in con	nposition and ia	ibeling
King of Prussia, PA 19406	, 03.10 102		EPA Reg No.	_				
Check if this is a new ad	dress		Product Name	_				
		Se	ction - II					
Amendment – Explain be	elow	- 00		ed la	abels in respon	se to		
			Agency let		dated			i
Resubmission in respons	se to Agency letter dated		"Me Too"		ication	OTIF	ICATION	l
X Notification – Explain be	low		Other – Ex	cplaii	n below	AUC	0 8 2014	
Explanation: Use additional properties of postal code in the This notification is consistent to the labeling or the confident false statement to EPA. I further product may be in violation of	e listed address in box 2 a vith the provisions of PR I ial statement of formula o her understand that if this	and column 11. Notice 98-10 an f this product. notification is n	d EPA regulations at 4 I understand that it is a ot consistent with the te	viola erms	ation of 18 U.S of PR Notice	S.C. Sec. 98-10 an	1001 to willfully d 40 CFR 152.	make any
		Se	ction III				<u> </u>	
1. Material This Product Will b								
Child-Resistant Packaging Yes	Unit Packaging Yes		Water Soluble Packagi Yes	ing			pe of Container Metal	
		1					Plastic	
No	No		No				Glass	
*Certification must	If "Yes"		If "Yes"		No. per		Paper	
be submitted	Unit Packaging wgt.	container	Package wgt		container		Other (Specify)	
3. Location of Net Contents In	formation	4. Size(s) Re	tail Container		5. Loc	cation of	label directions	
Label	Container	(2)				On Label		
6. Manner in Which Label is A	ffixed to Product	Lithogra	•		Other			
		Paper of Stencile						
			ction IV		·			
Contact Person (Complete	items directly below for id			ed. if	necessary, to	process	this application	.)
Name Rebecca A. Clemmer		Title	ory Manager		Teleph		(Include Area	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law 6. Date Application Received						ation		
2. Signature		3. Title					(Stam	ped)
R. a Chim	~ 1	Regulate	ory Manager					
4. Typed Name		5. Date						
Rebecca A. Clemmer		1/1	du 6,201.	4				

EPA Form 8570-1 (Rev. 8-94) Previous editions are obsolete.

White – EPA File Copy (Original) Yellow – Applicant Copy



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

Ann Tillman United Phosphorus Inc. c/o Pyxis Regulatory Consulting, Inc. 4110 136th St NW Gig Harbor, WA 98332

JUN 1 2 2014

Subject: Label Amendment – Addition of Previously Approved Crops

UPI Technical Pendimethalin EPA Reg. No. 70506-246

Application dated - March 25, 2014

Dear Ms. Tillman:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable.

A stamped copy of the label is enclosed for your records. This label supersedes all previously accepted labels. You must submit one (1) copy of the final printed label before you release the product for shipment. Products released for shipping after eighteen (18) months must bear the new revised label. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA §6(e). Your release for shipment of the product constitutes acceptance of these conditions.

If you have any questions regarding this letter, please contact Maggie Rudick at (703) 347-0257 or rudick.maggie@epa.gov.

Sincerely,

Kable Bo Davis Product Manager 25

Herbicide Branch

Registration Division (7505P)

UPI TECHNICAL PENDIMETHALIN For Manufacturing Use Only

ACTIVE INGREDIENT

KEEP OUT OF REACH OF CHILDREN CAUTION

	FIRST AID
If swallowed	 Call a poison control center or doctor immediately for treatment advice.
	 Have person sip a glass of water if able to swallow.
	 Do not induce vomiting unless told to do so by the poison control center or doctor.
	 Do not give anything by mouth to an unconscious person.
If in eyes	 Hold eye open and rinse slowly and gently with water for 15-20 minutes.
	 Remove contact lenses, if present, after the first 5 minutes, the
	continue rinsing eye.
	 Call a poison control center or doctor for treatment advice.
If on skin or	Take off contaminated clothing.
clothing	• Rinse skin immediately with plenty of water for 15-20 minutes.
	 Call a poison control center or doctor for treatment advice.
If inhaled	Move person to fresh air
	 If person is not breathing, call 911 or an ambulance, then give
	artificial respiration, preferably by mouth if possible.
	• Call a poison control center or doctor for further treatment advice.
Have the product	container or label with you when calling a poison control center or doctor.
	nedical treatment information, contact the Rocky Mountain Poison Control
Center at 1-866-6	
FOR CHEMICAL	L EMERGENCY: Spill, leak, fire, exposure, or accident, call CHEMTREC a
1-800-424-9300.	

(I) UPI

United Phosphorus, Inc. 630 Freedom Business Center King of Prussia, PA 19406 1-800-438-6071 • www.upi-usa.com EPA Reg. No. 70506-246 EPA Est. No.

Net Weight:

ACCEPTED
JUN 1 2 2014

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EFA Rep No. 70506-2 ib.

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Caution: Harmful if swallowed. Wash thoroughly with soap and water after handling.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish. Do not discharge effluent containing this product directly into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in wiring prior to discharge. Do not discharge effluent containing this product into sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

ATTENTION: Do not use air pressure or apply heat with open flame to remove contents of this drum. After emptied, drum may retain solid, liquid, and/or vapor residues. Continue to observe all precautions on the label. Do not cut, puncture, torch, or weld on or near the emptied drum. Do not use for other purposes.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Formulators using this product are responsible for obtaining EPA registration of their formulated products.

Only for formulation into herbicides for the following uses:

alfalfa, artichoke, asparagus, beans (edible), *Brassica* head and stem vegetables (subgroup 5-A), *Brassica* leafy greens (subgroup 5B), carrots, carrots grown for seed, cotton, citrus fruit (crop group 10), corn (field, pop, field seed, pop seed, fresh sweet), fallow, fruiting vegetables (crop group 8), garlic, grain sorghum, grape, Juneberry, leaf lettuce, leek, lentils and peas, melon subgroup 9A, mint (peppermint and spearmint), non-bearing citrus, non-bearing olive trees, nonbearing pome fruit, non-bearing small vine fruit (subgroup 13-07E), non-bearing fruit, non-bearing tree nuts, non-bearing vineyards, olive, onion (green, dry bulb), peanuts, perennial grasses grown for seed, pistachio, pome fruit (crop group 11), pomegranate, potatoes, rice, shallots (green, dry bulb), small vine fruit (subgroup 13-07E), soybeans, strawberry, stone fruit (crop group 12), sugarcane, sunflowers, tobacco, tree nuts (crop group 14), turnip greens, vegetable soybean (edamame), wheat, Bermudagrass and other perennial warm season grasses, Christmas tree plantations, farmsteads, landscape or ground maintenance, ornamentals, turf grasses, and noncropland areas.

STORAGE AND DISPOSAL

Pesticide Storage: Do not contaminate water, food or feed by storage or disposal. Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Container Disposal: Nonrefillable container. Do not reuse or refill this container. Clean promptly after emptying. Triple rinse or pressure rinse as follows.

Triple rinse: Empty the remaining contents into application equipment or a mix tank. Fill the container ¼ full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times.

<u>Pressure rinse:</u> Empty the remaining contents into application equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 psi for at least 30 seconds. Drain for 10 seconds after flow begins to drip.

Then offer for recycling if available, or puncture and dispose of in a sanitary landfill, or by incineration, or by other procedures allowed by state and local authorities

Manufacturing Chemical: Do not ship or store with food, feed, drugs or clothing.

CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

United Phosphorus, Inc. warrants that at the time of delivery, this product will conform to its chemical description on the label, that it is reasonably fit for the purposes referred to in the Directions for use, that it will pass without objection in the trade under the contract description, that the seller will convey title hereto, and that such product will be delivered free from any lawful security interest, lien or encumbrance.

To the extent allowed by applicable law, UNITED PHOSPHORUS, INC. MAKES NO OTHER WARRANTIES, EXPRESS OR IMPLIED, OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE OR OTHERWISE, THAT EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. BUYER ACKNOWLEDGES THE USE OF ITS OWN INDEPENDENT SKILL AND EXPERTISE IN THE SELECTION AND USE OF THE PRODUCT AND DOES NOT RELY ON ANY ORAL OR WRITTEN STATEMENTS OR REPRESENTATIONS.

Rev. 6/2/2014

Rudick, Maggie

From:

Rudick, Maggie

Sent:

Thursday, May 29, 2014 5:00 PM

To: Cc: 'Ann Tillman' Davis, Kable

Subject:

RE: Revised Label Needed- EPA REG # 70506-246

Ann -

Per the residue chemistry test guidelines **OPPTS 860.1000 Background**, under (3)(iii) Additional Considerations "The Agency will consider these (alfalfa and clover grown for seed but as a non-food use) on a case-by-case basis for FIFRA section 24(c) registrations..."

Therefore, "clover grown for seed" is allowed as a 24(c) only and cannot be incorporated into the master label. This allows the states to better monitor the application of clover grown for seed for this use to assure it is not produced for food uses.

http://www.epa.gov/ocspp/pubs/frs/publications/Test Guidelines/series860.htm

Please let me know if you have any further questions regarding this use.

Maggie Rudick
U. S. Environmental Protection Agency
Office of Pesticides Program
Registration Division; Herbicide Branch
(703) 347-0257
Rudick.Maggie@epa.gov

From: Ann Tillman [mailto:Ann@PyxisRC.com]

Sent: Thursday, May 29, 2014 4:22 PM

To: Rudick, Maggie

Subject: RE: Revised Label Needed- EPA REG # 70506-246

Maggie,

When you get a chance, can you check out the following information from FIFRA? Thanks.

According to FIFRA Section 24(c), "A State may provide registration for additional uses of federal registered pesticides formulated for distribution and use within the State to meet special local needs in accord with the purposes of [FIFRA] and if registration for such use has not been previously been denied, disapproved, or canceled by the Administrator. Such registration shall be deemed registration under [section 3] for all purposes of [FIFRA], but shall authorize distribution and use [only] within such State." Since a 24(c) is equivalent to a section 3 for the uses within the States with the section 24(c), there is no fee for converting a 24(c) to a Section 3. Specifically, a registrant may choose to add 24(c) uses to its master label provided the proposed uses on the label are restricted to the State or States with an appropriate Section 24(c). If the proposed directions on the label allow use beyond what was approved in the section 24(c) registration(s), then the application will be considered an application for a new use and will be subject to the appropriate PRIA fee.

Ann

Ann M. Tillman, Ph.D.
Pyxis Regulatory Consulting, Inc.
4110 136th St. NW
Gig Harbor, WA 98332
Office (253) 853-7369
Fax (253) 853-5516
Email Ann@PyxisRC.com

From: Rudick, Maggie [mailto:Rudick.Maggie@epa.gov]

Sent: May 29, 2014 3:41 PM

To: Ann Tillman

Subject: Revised Label Needed- EPA REG # 70506-246

Ms. Tillman -

The Agency has completed the primary review on one of your label amendments submitted for pendimethalin – EPA Reg # 70506-246. Per our review, the following revisions need to be made:

UPI Technical Pendimethalin

- 1. Biofuel crops (FL, LA, NC, TX only) needs to be removed from the label. In order to add this use, which exists in 24(c) labels only, it must be submitted as a PRIA R350 action.
- No tolerance exists for 'clover grown for seed'. Therefore, this use needs to be removed from the label. We understand that the use exists on the cited product and we are working with that company separately on this issue.

Please submit a revised label via email. Thank you. I am currently working on 70506-230 and will send you label comments/questions once I am finished.

Thank you,

Maggie Rudick
U. S. Environmental Protection Agency
Office of Pesticides Program
Registration Division; Herbicide Branch
(703) 347-0257
Rudick.Maggie@epa.gov

Rudick, Maggie

From: Ann Tillman <Ann@PyxisRC.com>
Sent: Monday, June 02, 2014 2:40 PM

To: Rudick, Maggie

Subject: RE: Revised Label Needed- EPA REG # 70506-246

Attachments: 070506-246.20140602.UPI Pendimethalin Technical Label_changes tracked.pdf;

070506-246.20140602.UPI Pendimethalin Technical Label.pdf

Maggie,

The revised labels (changes tracked and clean copies) are attached.

Ann

From: Rudick, Maggie [mailto:Rudick.Maggie@epa.gov]

Sent: May 29, 2014 3:41 PM

To: Ann Tillman

Subject: Revised Label Needed- EPA REG # 70506-246

Ms. Tillman -

The Agency has completed the primary review on one of your label amendments submitted for pendimethalin – EPA Reg # 70506-246. Per our review, the following revisions need to be made:

UPI Technical Pendimethalin

- 1. Biofuel crops (FL, LA, NC, TX only) needs to be removed from the label. In order to add this use, which exists in 24(c) labels only, it must be submitted as a PRIA R350 action.
- 2. No tolerance exists for 'clover grown for seed'. Therefore, this use needs to be removed from the label. We understand that the use exists on the cited product and we are working with that company separately on this issue.

Please submit a revised label via email. Thank you. I am currently working on 70506-230 and will send you label comments/questions once I am finished.

Thank you,

Maggie Rudick
U. S. Environmental Protection Agency
Office of Pesticides Program
Registration Division; Herbicide Branch
(703) 347-0257
Rudick.Maggie@epa.gov

Please read instructions	on n	verse before comple	ting form.			Form Apr	oravea	, om	No. ;	2070-008	O. Approvel expires 2-28-9
≎EPA		Environmenta	Inited States I Protecti ngton, DC 20		ency		1	_	endr	tion nent	OPP Identifier Number
			Applicati	on for	Pesticid	e - Sec	tion	l			
1. Company/Product Nur 70506-246	mber				2. EPA P B. Davi	roduct Man S	ager				oposed Classification
 Company/Product (Na United Phosphorus, In 		PI Technical Pendin	nethalin		PM#		25				, restricted
5. Name and Address of United Phosphorus, Ir c/o Pyxis Regulatory (4110 136th St. NW Gig Harbor, WA 9833	ac. Cons		de)		(b)(i), m	y product i	is sim	ilar or	ident	ical in co	FIFRA Section 3(c)(3) mposition and labeling
Check if	this	is a new address			Produc	t Name					
				Sec	tion - II						
Amendment - Exp Resubmission in a Notification - Exp	respo	nse to Agency letter	dated		_ [Final printed Agency lett "Me Too" A Other - Exp	er dat Applica	ed ation.	psonse	to .	
Meterial This Product	VAGN	Ba Dagle and be		Sec	tion - II						
Child-Resistant Packagin		Unit Packaging		Water	Soluble Pa	rck egipa		2 T	me of	Container	
Yes		Yes No			Yes No					Metal Plastic Glass	
* Certification must be submitted	t	If "Yes" Unit Packaging wgt.	No. per container	If "Ye Packa	s" ge wgt	No. per containe	r			Paper Other (S	Specify)
3. Location of Net Conte	1	nformation ontainer	4. Size(s) Re	otail Conta	iner		5. Lo	On	Label	el Directio	
6. Manner in Which Lebe	el is /	Affixed to Product	Litho Pape Stene	graph r glued ciled		Othe	٠				
				Sec	tion - I\	/					
1. Contact Point (Comp	lete i	items directly below i	for identificati	on of indiv	vidual to be	contacted,	if nec	essary	, to pr	ocess tic	application.)
Name Pyxis Regulatory Co	onsu	ilting, Inc.		Title Consu	ltant						n No. (Include Area Code) 53-7369
I certify that the s I acknowledge the both under applice	t any	nents I have made or y knowlinglly false or aw.	Certific this form an misleading st	d all attacl	hments the	reto are tru ishable by fi	e, acc ine or	urata a impriso	nd cor	mplu(a. t or	6. Date Application Received (Stamped)
2. Signeture	~ S	h. Tellen	-	3. Title Consu	ltant						
4. Typed Name Ann M. Tillman				5. Date	3/25	114					

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW Gig Harbor, WA 98332

Phone: 253-853-7369 Fax: 253-853-5516 www.PyxisRC.com

March 25, 2014

COURIER DELIVERY

Bo Davis (PM 25)
Document Processing Desk (AMEND)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

RE: United Phosphorus, Inc.

UPI Technical Pendimethalin (EPA Reg. No. 70506-246)

Application for Amended Registration

Dear Mr. Davis,

On behalf of United Phosphorus, Inc., we are submitting an application to amend the registration of UPI Technical Pendimethalin to add uses. The use sites being added may be found on the following EPA-registered technical or end-use product labels:

Pendimethalin Technical, EPA Reg. No. 241-245 Prowl H20 Herbicide, EPA Reg. No. 241-418

In support of this application, we submit the following documents:

- 1. Application for a Pesticide Registration (EPA Form 8570-1)
- 2. One (1) copy of the UPI Technical Pendimethalin label with changes tracked
- 3. Three (3) Copies of the UPI Technical Pendimethalin label with changes incorporated
- 4. A CD containing an electronic version of the proposed labeling
- 5. Certification with Respect to Label Integrity
- 6. Certification with Respect to Citation of Data (EPA Form 8570-34)
- 7. Agency Internal Use Copy of the Data Matrix
- 8. Public File Copy of the Data Matrix
- 9. Letter of Authorization

Because no data are being submitted with this amendment, and no data will need to be reviewed to approve the proposed labeling, United Phosphorus, Inc. believes this action qualifies as a Fast Track amendment and is not subject to a Pesticide Registration Service Fee. Please feel free to contact me ((253) 853-7369, Ann@PyxisRC.com) if you have any questions or need any additional information.

Sincerely,

Ann M. Tillman

Consultant, United Phosphorus, Inc.

Enclosures

cc: D. Olson, United Phosphorus, Inc.



United Phosphorus, Inc.

David L. Olson 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406 (610) 491-2814 dave.olson@uniphos.com

April 2, 2010

To Whom It May Concern:

RE: Letter of Authorization

Dear Sir or Madam:

Please let this letter serve to confirm that Pyxis Regulatory Consulting, Inc. is authorized to act as an agent for United Phosphorus, Inc. (EPA Company Number 70506), before the U.S. Environmental Protection Agency and state governmental agencies in all matters regarding our pesticide registrations pursuant to the Federal Insecticide, Fungicide and Rodenticide Act ("FIFRA"), 7 U.S.C. § 136 et seq. and state law.

If you have any questions, please do not hesitate to contact me.

Sincerely,

David L. Olson

Director, Regulatory Affairs

cc: Pyxis Regulatory Consulting, Inc.

12 Olam



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 401 M Street, S.W. WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send

comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the completed form to this address.						
Certification with Respect	to Citation of I	Data				
Applicant's/Registrant's Name, Address, and Telephone Number Ued Phosphorus, Inc. d/o Pyxis Regulatory Consulting 4110 136th St NW Gig Harbor WA 98	332 253- 853-73 66	EPA Registration Number/File Symbol 70506-246				
Active Ingredient(s) and/or representative test compound(s) Pendimethalin		Date 3/25/14				
General Use Pattem(s) (list-all those claimed for this product using 40 CFR Part 158) TGAI		Product Name UPI Technical Pendimethalin				
NOTE: If your product is a 100% repackaging of another purchased EPA-registered submit this form. You must submit the Formulator's Exemption Statement (EPA Form		r all the same uses on your label, you do not need to				
I am responding to a Data-Call-In Notice, and have included with this form a libe used for this purpose).	st of companies ser	nt offers of compensation (the Data Matrix form should				
SECTION I: METHOD OF DATA SUPPO	ORT (Check one me	ethod only)				
I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).	✓ under the	the selective method of support (or cite-all option selective method), and have included with this form a list of data requirements (the Data Matrix form must be				
SECTION II: GENERAL O	FFER TO PAY					
[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements] I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.						
SECTION III: CERTII	FICATION					
I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.						
I certify that for each exclusive use study cited in support of this registration the written permission of the original data submitter to cite that study.	or reregistration, tha	at I am the original data submitter or that I have obtained				
I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either. (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and I also offered (I) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.						
I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evider. of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.						
l certify that the statements I have made on this form and all attachme knowingly false or misleading statement may be punishable by fine or imprisor	ents to it are true, nment or both und	accurate, and complete. I acknowledge that any ler applicable law.				
Signature Date 3/25-1/4 Typed or Printed Name and Title Ann M. Tillman, Consultant						

EPA Form 8570-34 (9-97) Electronic and Paper versions available. Submit only Paper version.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 401 M Street, S.W. WASHINGTON, D.C. 20460

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DATA MATRIX						
Date: March 25, 2014		EPA Reg No./ File Symbol: 70506-246	Page 1 of 3			
Applicant's/Registrant's Name and Address:	United Phosphorus, Inc. 630 Freedom Business Center King of Prussia, PA 19406	Product: UPI Technical Pendimethalin				
Ingredient: Pendimethalin (108501)						

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
		Number			
PRODUCT SPECIFIC					}
830.1550	Product identity and composition	47933901	UPI	OWN	
830.1600	Description of Materials Used to Produce the Product	47933901	UPI	OWN	
830.1620	Description of the Production Process	47933901	UPI	OWN	
830.1650	Description of the Formulation Process				Not applicable for technical
830.1670	Discussion of Formation of Impurities	47933901 48642701	UPI UPI	OWN OWN	
830.1700	Preliminary Analysis	47933901 47933904	UPI UPI	OWN OWN	
830.1750	Certified Limits	47933901	UPI	OWN	
830.1800	Enforcement Analytical Method	47933901 47933905	UPI UPI	OWN OWN	
830.6302	Color	47944401	UPI	OWN	
830.6303	Physical State	47944401	UPI	OWN	
830.6304	Odor	47944401	UPI	OWN	
830.6313	Stability to Normal and Elevated Temperatures, Metals and Metal Ions	47944401	UPI	OWN	
830.6314	Oxidation/Reduction: Chemical Incompatibility	48642702	UPI	OWN	
830.6315	Flammability	48642703	UPI	OWN	
830.6316	Explodability				Not applicable for technical
830.6317	Storage Stability	47944401	UPI	OWN	

Signature	Name and Title	Date
111	Ann M. Tillman, Consultant	Mar. 25, 2014
Com M. Jeller		
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DATA MATRIX						
Date: March 25, 2014		EPA Reg No./ File Symbol: 70506-246	Page 2 of 3			
Applicant's/Registrant's Name and Address:	United Phosphorus, Inc. 630 Freedom Business Center King of Prussia, PA 19406	Product: UPI Technical Pendimethalin				
Ingredient: Pendimethalin (108501)	King of Frussia, 174 17400					

Guideline Reference	Guideline Study Name	MRID	Submitter	Status	Note
Number		Number			
830.6319	Miscibility				Not applicable for technical
830.6320	Corrosion Characteristics	47944401	UPI	OWN	
830.6321	Dielectric Breakdown Voltage				Not applicable for technical
830.7000	pH	47944401	UPI	OWN	
830.7050	UV/Visible Absorption	47944401	UPI	OWN	
830.7100	Viscosity				Not applicable for technical
830.7200	Melting Point/Melting Range	4794440 I	UPI	OWN	
830.7220	Boiling Point/Boiling Range				Not Required –product is a solid
830.7300	Density/Relative Density/Bulk Density	4794440 I	UPI	OWN	
830.7370	Dissociation Constants in Water	47944401		OWN	
830.7550	Partition Coefficient (n-octanol/water), Shake Flask Method	47944401	UPI	OWN	
830.7560	Partition Coefficient (n-octanol/water), Generator Method				See 830.7550
830.7570	Partition Coefficient (n-octanol/water), Estimation by Liquid Chromatography				See 830.7550
830.7840	Water Solubility: Column Elution Method, Shake Flask Mathod	47944401	UPI	OWN	
830.7860	Water Solubility: Generator Column Method				See 830.7840
830.7950	Vapor Pressure	47944401	UPI	OWN	
870.1100	Acute oral toxicity – rat	47933906	UPI	OWN	
870.1200	Acute dermal taxicity - rat	47933907	UPI	OWN	
870.1300	Acute inhalation (oxicity - rat	47933908	UPI	OWN	

Signature	Name and Title	Date
1 1 100	Ann M. Tillman, Consultant	Mar. 25, 2014
am M. Jeller		



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	DATA MA	• • • • • • • • • • • • • • • • • • • •	
Date: March 25, 2014		EPA Reg No./ File Symbol: 70506-246	Page 3 of 3
Applicant's/Registrant's Name and Address:	United Phosphorus, Inc. 630 Freedom Business Center King of Prussia, PA 19406 Product: UPI Technical Pendimethalin		

Guideline Reference	Guideline Study Name	MRID	Submitter	Status	Note
Number		Number			
870.2400	Eye irritation	47933909	UPI	OWN	
870.2500	Skin irritation	47933910	UPI	OWN	
870.2600	Skin sensitization	47933911	UPI	OWN	

GENERIC DATA				
	CITE ALL	BASF Corp., Bayer Cropscience LP,	PAY	Note: UPI is a member of the
		FMC Corp., E. I. DuPont de Nemours		Spray Drift Task Force, the
		and Co., Inc., The Scotts Company,		Agricultural Reentry Task
		Southern States Cooperative, BASF		Force, the Generic Endangered
		Corp., The Andersons Lawn		Species Task Force, and the
		Fertilizer Division, Lesco Inc., Drexel		Outdoor Residential Exposure
		Chemical Co., Loveland Products,		Task Force and offer to pay
		Howard Fertilizer & Chemical Co,		letters are not required.
		Harrell's LLC, Control Solutions,		
		Cedar Chemical Corp., Everris NA,		İ '
		Inc., Spray Drift Task Force, Repar		
		Corp., Outdoor Residential Exposure		
		Task Force, Agricultural Reentry		1
		Task Force, FIFRA Endangered]
		Species Task Force, Residential		
		Exposure JV, Agricultural Handlers		1
		Exposure Task Force, CropLife		1
		America, Generic Endangered		
		Species Task Force.		

	Signature	Name and Title	Date	
		Ann M. Tillman, Consultant	Mar. 25, 2014	
	am M. Jelle			
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

March 26, 2014

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

MS. SHERRY B. HUTCHESON UNITED PHOSPHORUS, INC 630 FREEDOM BUSINESS CENTER, SUITE 402 KING OF PRUSSIA, PA 19406-

PRODUCT NAME: UPI TECHNICAL PENDIMETHALIN

COMPANY NAME: UNITED PHOSPHORUS, INC

OPP IDENTIFICATION NUMBER: EPA FILE SYMBOL: 70506-246 EPA RECEIPT DATE: 03/25/14

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Registration Division, Risk Management Team 25, at (703) 306-0415.

Sincerely,

Front End Processing Staff Information Services Branch Information Technology & Resources Management Division *Confidential Statement of Formula may be entitled to confidential treatment*